

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
WESTERN DIVISION

Stephen M. Gowan,	)	
	)	
Plaintiff,	)	Civ. 14-5025-LLP
	)	
v.	)	
	)	
Mid Century Insurance Company,	)	
a division of Farmers Insurance	)	
Group,	)	
	)	
Defendant.	)	
_____	)	

**Plaintiff's Motion to Extend Deadlines**

Pursuant to F.R.Civ.P. 16(b)(4), plaintiff moves to modify the Scheduling Order (doc. 35) for good cause shown.

1. Docs. 21 and 30, plaintiff's Motion to Compel Discovery and Second Motion to Compel Discovery, as well as doc. 37, plaintiff's Motion for Leave to File Amended Complaint, are pending before the Court.

2. Plaintiff files herewith his Third Motion to Compel Discovery, which raises issues that were raised in plaintiff's prior, pending motions to compel discovery.

3. Plaintiff has one opportunity to depose defendants' claims employees who handled this case. Plaintiff needs rulings on his motions to compel discovery, and to receive all documents that the Court orders disclosed, in order to take meaningful and comprehensive depositions. After these depositions are taken, plaintiff's expert needs transcripts in order to analyze defendant's bad faith and prepare his report.

4. Accordingly, plaintiff moves to extend the time by which the identify of and reports from his retained experts are due from August 31, 2015 (doc. 35, paragraph 2), until 30 days after he receives the transcripts of the depositions of defendant's claims employees.

5. The current scheduling order makes the identify of and reports from defendant's retained experts due by 29 days after the reports from plaintiff's experts are due. Plaintiff suggests that the revised scheduling order keep this same approach.

Plaintiff believes this motion does not raise a question of law, so a brief is not filed herewith. Local Rule 7.1 B.

Dated: August 12, 2015

/s/ James D. Leach

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*Certificate of Service*

I certify that I filed this document electronically on August 12, 2015, thereby causing automatic electronic service to be made on defendant.

/s/ James D. Leach

James D. Leach